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CHADD M. HILLEN

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

12 CHADD M. HILLEN) Case No.: 2:16-cv-00913-JCM-VCF
13 Plaintiff,)
14 v.) STIPULATION TO EXTEND TIME
15 CAROLYN W. COLVIN, Acting) TO FILE Motion to Remand
16 Commissioner of Social Security.) (FIRST REQUEST)
17 Defendant.)
18)
19)

19 Plaintiff Chadd M. Hillen (“Plaintiff”) and defendant Carolyn Colvin,
20 Commissioner of Social Security (“Defendant”), through their undersigned counsel
21 of record, hereby stipulate, subject to the approval of the Court, to extend the time
22 for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to March 2,
23 2017; and that Defendant shall have until April 3, 2017, to file her opposition, if
24 any is forthcoming. Any reply by plaintiff will be due April 24, 2017.

1 An extension of time for plaintiff is needed in order to properly prepare
2 plaintiff's motion addressing the legal issues within the administrative record in
3 this matter. Counsel sincerely apologizes to the court for any inconvenience this
4 may have had upon it or its staff.

5

6 DATE: January 9, 2017 Respectfully submitted,
7
8 /s/ *Cyrus Safa* LAWRENCE D. ROHLFING

9 BY: _____
10 Cyrus Safa
Attorney for plaintiff Mr. Chadd M. Hillen

12 DATE: January 9, 2017 Daniel G. Bogden
13 United States Attorney

14 || /S/ *April A. Alongi*

15 BY: April A. Alongi
16 Special Assistant United States Attorney
17 Attorneys for defendant Carolyn W. Colvin
|*authorized by e-mail|

19 | DATED: 1-10-2017

20 | IT IS SO ORDERED

Carl G. Gallo

UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:16-CV-00913-JCM-VCF**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on January 9, 2017.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ *Cyrus Safa*

Cyrus Safa
Attorneys for Plaintiff